

Eastern States' Consortium on HDPEP Participant Responsibilities

I Background:

Fourteen eastern States have formed a consortium, known as the Eastern States' Consortium (ESC), to establish minimum requirements for the quality control procedures that the manufacturers of High Density Polyethylene Pipe must subscribe to in order to supply pipe to participating states. The ESC has identified responsibilities that the participating manufacturers, States, and the Lead State must follow for the program to operate efficiently. The States currently participating in the consortium are CT, DE, DC, ME, MD, MA, NC, NH, NJ, NY, PA, RI, VT, & VA. with NH as the Lead State. The manufactures currently participating are Advanced Drainage Systems, Baughman Tile, Hancor, Lane, and Soleno. This document summarizes the responsibilities for the different parties, which can be found in more detail in the ESC Operating Procedures and the ESC Quality Control Requirements for HDPE Pipe Manufacturers.

II Manufacturers' Responsibilities:

Participating manufacturers must develop and implement a Quality System Manual (QSM) outlining their quality control testing program for raw materials, manufactured fittings, and finished pipe. In addition, the manual must addresses the following general program, testing facilities, personnel qualification, and record keeping requirements:

1. General Requirements:

- Each manufacturer must be prepared to accommodate testing facility inspections by ESC representatives when submitting its initial Quality System Manual (QSM), or updated QSM in the case of qualification renewal, to the Lead State. The ESC will attempt to conduct the inspection within 30 days of approval of the documentation.
- Each testing facility is responsible for ensuring continuous compliance with all ESC quality control requirements. Failure to do so may result in revocation of manufacturer qualification.
- Each manufacturer is to maintain a summary of all independent laboratory test results and the corresponding manufacturers split sample tests for inclusion in the QSM at the time of submittal for re-qualification.

2. Testing Facilities:

The following seven requirements pertain to the qualification of quality control testing facilities:

- The manufacturer's quality control manager shall be responsible for quality control testing at all facilities and shall assure that all sampling and testing is done by qualified technicians.

- The testing facilities shall maintain current versions of all AASHTO, ASTM, and Company test procedures for all tests performed and a current version of the Company's QSM.
- The facilities must adequately house and allow proper operation of all required testing equipment.
- The testing equipment shall be calibrated/verified in accordance with the manufacturer's recommendations at least once every 12 months by personnel customarily involved in such work as documented in the QSM.
- All testing equipment shall be properly maintained and maintenance activities shall be documented.
- The testing facilities shall maintain records of all test results and all ESC reviews and actions taken to resolve any noted deficiencies.
- Records of equipment calibration and verification will be maintained and available to Consortium States upon request.

3. Testing Personnel:

The ESC has also identified the following requirements for quality control testing personnel:

- The manufacturer's quality control manager shall meet the requirements established by the company for the position. The quality control manager's resume shall be included in the QSM.
- Documentation must show that the technician has been trained in the test procedures he/she must perform.
- Documentation must show that the technician has satisfactorily demonstrated her/his competency to perform the required testing and that this demonstration is repeated annually.
- Documentation must show that the technician training has been updated when required by revisions in test methods.
- Review of reports must show that the technician can properly perform test procedure calculations and properly record information.
- Technicians-in-training may perform sampling and testing at ERC qualified facilities provided they are working under the direct supervision of a technician fully qualified under ESC requirements.
- If requested, technicians must perform sampling and testing for ESC observers. Split samples may also be taken for testing by ESC members.

4. Testing Documentation

The ESC has established the following requirements for testing documentation:

- All quality control test results for resins and pipes must be documented in reports of the same format as the sample forms submitted in the QSM and must be kept for five years.
- The reports must document the actions taken in the event of resin or product test failures.
- The reports must show the plant, date, shift of manufacture, production line, and lot designation of resin. Identification must be such that the test

reports for any piece of pipe can be located, including the test results for the resin used to manufacture the pipe.

- Resin producer certifications must include the results of the producer's tests and be kept for five years.

III. State Agency Responsibilities:

Each participating State will have the following responsibilities in implementing the ESC testing facility qualification program:

- Each State will designate a contact person for inquiries regarding the program and provide the name and phone number of the contact person to the ESC Lead State.
- When requested by the Lead State, the States will make every effort to provide a person to participate in inspections of manufacturers' quality control testing facilities within their State or an adjacent non-member State or Province using the appropriate program guidelines. If a participating state is unable to fulfill obligations due to travel restrictions, the Lead State will ask other members to perform these inspections.
- The State conducting the inspection will contact the manufacturer's quality control manager to arrange for the inspection of quality control testing facilities.
- Once the inspection has been completed, a copy of the inspection report will be forwarded to ESC Lead State for inclusion in the facility qualification database. Each State shall retain the original copy of all completed inspection documentation.
- If an ESC State does acceptance or other testing of pipe made by an ESC qualified manufacturer, the State is encouraged to furnish a copy of the test results to the manufacturer and to the Lead State.

IV. ESC Lead State Responsibilities:

The ESC Lead State will be responsible for administering the testing facility qualification program as follows:

- The Lead State will notify the contact person in the participating State where the quality control testing facility is located when an inspection is required. With the approval of this State, the Lead State may also ask other ESC representatives to participate in the inspection. When the facility is not located in a participating State, the Lead State will arrange for ESC volunteers to conduct the inspection.
- The Lead State will maintain a testing facility qualification database and will be responsible for entering inspection information obtained from the Facility Inspection Reports forwarded by the participating States for each facility that is inspected.
- The Lead State will notify the manufacturer and the participating States of the status of the testing facility qualification after completion of the

- inspection. If the facility is not qualified, the Lead State notification will include a detailed explanation of the deficiencies.
- The Lead State will maintain the ESC web site that will include the list of ESC qualified manufacturers and other information relevant to the program.
 - As long as the manufacturer has submitted its request for renewal of ESC qualification by November 1 of the current year, the Lead State will grant a three- month grace period for a testing facility to be re-inspected and re-qualified in accordance ESC procedures.
 - The Lead State will respond to inquiries related to the qualification for individual testing facilities as they occur during the year.

IV. Manufacturer Disqualification From the ESC:

All manufacturers must ensure that all quality control testing facilities, personnel, and sampling and testing activities are in continuous conformance with the ESC requirements. The Lead State, based on results of ESC inspections or the acceptance or other testing done by individual States, may rescind ESC manufacturer qualification if a facility is determined not to comply with the ESC requirements. The Lead State shall forward a letter of explanation to the affected manufacturer and all participating States detailing the reason(s) for revocation of the qualification. Appeals of such revocation shall be handled by the Lead State.